



# INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

**Intermediate Operating Permit Number:**

**Expiration Date:**

**Installation ID:** 051-0028

**Project Number:** 2007-03-074

**Installation Name and Address**

R.R. Donnelley & Sons Company  
321 Wilson Drive  
Jefferson City, MO 65109  
Cole County

**Parent Company's Name and Address**

R.R. Donnelley & Sons Company  
111 South Wacker Drive  
Chicago, IL 60606

**Installation Description:**

R.R. Donnelley & Sons Company operates a book manufacturing facility in Jefferson City, MO. There are currently 11 web presses with natural gas fired dryers at this facility. Emissions are vented to two Salem regenerative thermal oxidizers.

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Effective Date

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Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Von Hoffman Press, Inc. operates a book manufacturing facility in Jefferson City, MO. There are currently 11 web presses with natural gas fired dryers at this facility. Emissions are vented to two Salem regenerative thermal oxidizers.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	---	---	---	38.88	---	---	---
2007	---	---	---	34.13	---	---	6.20
2006	---	---	0.04	30.19	0.01	---	---
2005	---	---	0.05	45.79	0.01	---	---
2004	0.05	0.01	1.59	111.73	0.01	---	---

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Press #214 with Dryer
EU0020	Press #220 with Dryer
EU0030	Press #222 with Dryer
EU0040	Press #223 with Dryer
EU0050	Press #224 with Dryer
EU0060	Press #229 with Dryer
EU0070	Press #3001 with Dryer
EU0080	Press #3002 with Dryer
EU0090	Binding Operations
EU0100	Binding Operations

### EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment which does not have unit specific limitations at the time of permit issuance.

#### Description of Emission Source

Press #215 with 4 x 3.330 MMBtu/hr natural gas dryer  
Press #216 with 4 x 1.830 MMBtu/hr natural gas dryer  
Press #219 with a 2 x 3.295 MMBtu/hr natural gas dryer

### DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit No. 1294-017, Issued December 23, 1994
- 2) Construction Permit No. 0998-021, Issued September 11, 1998
- 3) Construction Permit No. 0696-019A, Issued February 19, 1997
- 4) Construction Permit No. 0795-017A, Issued September 11, 1995
- 5) Construction Permit No. 0999-002, Issued August 18, 1999
- 6) Construction Permit No. 072005-020, Issued July 11, 2005

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## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

#### Emission Limitation:

The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the installation in any consecutive 12-month period.

#### Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of monthly usage for each VOC emitting material.
2. The monthly emissions of volatile organic compounds from each VOC emitting material shall be calculated, Attachment A *or an equivalent form generated by the permittee* may be used.
3. The permittee shall calculate their annual emission of volatile organic compounds by summing the monthly emissions from each VOC emitting material for the last twelve months. The annual emission will be calculated each month using the most recent twelve months worth of monthly emission totals.
4. All records shall be kept for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at the installation.

#### Reporting:

1. If at any time the yearly emission limit of 100 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

### PERMIT CONDITION PW002

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

#### Emission Limitation:

1. The permittee shall emit less than ten (10) tons individually of any Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period.
2. The permittee shall emit less than twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period.

**Monitoring/Record Keeping:**

1. The permittee shall record the amount of each HAP emitting material used each month.
2. The permittee shall calculate the monthly and rolling 12-month HAP emissions for each individual HAP and for total combined HAPs using Attachments B & C *or equivalent forms generated by the permittee.*
3. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all material used at the installation.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

1. If at any time the yearly emission limit of 10 tons individual or 25 tons combined should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

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### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 – Press #214 and Dryer			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0010	Press #214; 8 Unit Ink/Oil; MHDR = 0.0101 tons ink/oil; 4 x 3.330 MMBtu/hr Natural Gas Dryer; Vented to RTO #1 and RTO #2; Constructed in 1995	Rockwell (Goss)/C-500	EP01

<b>PERMIT CONDITION EU0010-001</b> 10 CSR 10-6.060 Construction Permits Required Construction Permit #1294-017, Issued December 23, 1994
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**Emission Limitation:**

Von Hoffmann Press, Inc. shall not emit in excess of 40 tons of VOCs in any 12-month period from the operation of the Rockwell C-500 8-unit printing press (#214). [Special Condition No. 5]

**Monitoring/Recordkeeping:**

1. Von Hoffman Press, Inc. shall maintain the following records, sufficient to determine continuous compliance with emission conditions. These records shall be kept for at least two years, to be automatically extended if enforcement action is pending. As it is recognized that these records are kept in the corporate office currently located in St. Louis, the records shall be available within two hours of a verbal request for review by the Department of Natural Resources' personnel and other air pollution control agencies upon presentation of proper credentials. [Special Condition No. 6A]
2. Von Hoffmann Press, Inc. shall maintain records for each control device sufficient to demonstrate that the control efficiency is being maintained.
  - a) Results of any testing conducted on an emission unit.
  - b) Maintenance records of any air pollution control equipment. [Special Condition No. 6B]
3. For each web press, records shall be maintained to show:
  - a) Quantity in pounds of inks as applied to substrate on a monthly basis, and quantity in pounds of the solvents in the inks used;
  - b) Quantity of alcohol, or alcohol substitute(s), if either is used, by volume added to the fountain solution on a monthly basis, said quantities to be in gallons and pounds; and
  - c) Quantity in gallons of cleanup solvents used on a monthly basis. [Special Condition No. 6C]
4. In lieu of Special Condition 6C, Von Hoffmann Press may elect to keep records of the entire facility which will be sufficient to show:
  - a) Quantity in pounds of inks as applied to substrate on a monthly basis, and quantity in pounds of the solvents in the inks used;
  - b) Quantity of alcohol, or alcohol substitute(s), if either is used, by volume added to the fountain solution on a monthly basis, said quantities to be in gallons and pounds; and
  - c) Quantity in gallons of cleanup solvents used on a monthly basis. [Special Condition 6D]



5. Attachment A *or an equivalent form generated by the permittee* may be used to demonstrate compliance with the monitoring and recordkeeping requirements.

**Reporting:**

The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

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1.

EU0020 – Press #220			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0020	Press #220; 8 Unit Ink/Oil; MHDR = 0.0117 tons ink/oil; 4 x 2.0 MMBtu/hr Natural Gas Dryer, Vented to RTO #1 and RTO #2; Constructed in 1998	Gross/G-18	EP01

<b>PERMIT CONDITION EU0020-001</b> 10 CSR 10-6.060 Construction Permits Required Construction Permit #0998-021, Issued September 11, 1998
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**Emission Limitation:**

At all times that the proposed web press at Von Hoffmann Press, Inc. is in a printing operation, the corresponding dryer shall also be in operation and the subsequent emissions from the dryer shall be directed to the emission control devices. The emission control devices shall be the two (2) Salem regenerative thermal oxidizers (CD1 and CD2) or other approved equipment of equivalent destruction efficiency and any associated air induction devices. [Special Condition No. 1]

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1.

EU0030 – Press #222			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0030	Press #222; 8 Unit Ink/Oil; MHDR = 0.0116 tons ink/oil; 4 x 3.33 MMBtu/hr Natural Gas Dryer, Vented to RTO #1 and RTO #2; Constructed in 1996	Baker Perkins/G-25	EP01

**PERMIT CONDITION EU0030-001**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit #0696-019A, Issued February 19, 1997

**Emission Limitation:**

1. At all times, the proposed press (Press #222) and/or any of the other current presses at this installation are in a printing operation, the corresponding dryer shall also be in operation and the subsequent emissions from each of the corresponding dryers shall be directed to the emission control devices. The emission control devices shall be the two Salem Regenerative Thermal Oxidizers or other approved equipment of equivalent destruction efficiency and any associated air induction devices. [Special Condition No. 1]
2. If a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, the Director may require RR Donnelley & Sons Company to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. Von Hoffmann Press, Inc. shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of the permit. [Special Condition No. 2]

1.

<b>EU0040 and EU0050– Press #223 and #224</b>			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0040	Press #223; 8 Unit Ink/Oil; MHDR = 0.116 tons ink/oil; 4 x 3.33 MMBtu/hr Natural Gas Dryer, Vented to RTO #1 and RTO #2; Constructed in 1995	Baker Perkins/G-25	EP01
EU0050	Press #224; 8 Unit Ink/Oil; MHDR = 0.116 tons ink/oil; 4 x 3.33 MMBtu/hr Natural Gas Dryer, Vented to RTO #1 and RTO #2; Constructed in 1995	Baker Perkins/G-25	EP01

**PERMIT CONDITION (EU0040 through EU0050)-001**

10 CSR 10-6.060 Construction Permits Required

Construction Permit #0795-017A, Issued September 11, 1995

**Emission Limitation:**

1. Von Hoffmann Press, Inc. shall not emit more than 36 tons of Volatile Organic Compounds (VOCs) per year from the combined operations of presses #223 and #224 as identified in this permit. [Special Condition No. 1]
2. Emission controls proposed in this permit application shall be well maintained and used at all times these presses are carrying out printing operations or being cleaned by automated means. These controls include the thermal oxidizer as well as any associated induction fans, dampers and ductwork. [Special Condition No. 8]

**Monitoring/Record Keeping:**

1. Records shall be kept for the most recent five years of operation that show the tons of VOC emissions produced by both these presses. Records shall contain both the monthly and previous 12-month totals in a manner similar to that of the enclosed worksheet (Attachment D). These records shall be made available to Department of Natural Resources' Personnel within two hours of a verbal request. [Special Condition No. 2]
2. Attachment A *or an equivalent form generated by the permittee* may be used to demonstrate compliance with the monitoring and recordkeeping requirements.

**Reporting:**

1. Von Hoffmann Press, Inc. shall report to the Air Pollution Control Programs's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month, if the 12-month cumulative total (Special Condition No. 2) records show that the source exceeded the limitation of 32 tons of VOCs. [Special Condition No. 3]
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EU0060 – Press #229			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0060	Press #229; 8 Unit Ink/Oil; MHDR = 0.0117 tons ink/oil; 4 x 2.0 MMBtu/hr Natural Gas Dryer, Vented to RTO #1 and RTO #2; Constructed in 1998	Gross/G-18	EP01

<b>PERMIT CONDITION EU0070-001</b> 10 CSR 10-6.060 Construction Permits Required Construction Permit #0999-002, Issued August 18, 1999
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**Emission Limitation:**

At all times that the proposed web press (Press No. 229) at Von Hoffmann Press is in a printing operation, the corresponding dryer shall also be in operation and the subsequent emissions from the dryer shall be directed to the emission control devices. The emission control devices shall be the two (2) Salem regenerative thermal oxidizers (CD1 and CD2) or other approved equipment of equivalent destruction efficiency. [Special Condition No. 1]

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EU0070 and EU0080– Press #3001 and Press #3002			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0070	Press #3001; 4 Unit Ink/Oil; MHDR = .016 tons ink/oil combined with Press #3002; 2 x 4009 Btu/hr Natural Gas Dryer, Vented to RTO #1 and RTO #2; Constructed 2005	Gross/Sunday	EP-01
EU0080	Press #3002; 4 Unit Ink/Oil; MHDR = .016 tons ink/oil combined with Press #3002; 2 x 4009 Btu/hr Natural Gas Dryer, Vented to RTO #1 and RTO #2; Constructed 2005	Gross/Sunday	EP01

**PERMIT CONDITION (EU0080 through EU0090)-001**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit #072005-020, Issued July 11, 2005

**Emission Limitations:**

1. Control Requirements – Regenerative Thermal Oxidizer  
The natural gas fired regenerative thermal oxidizers at the installation must be in use at all times when the associated equipment, new 4-color heatset, offset web lithographic presses, are in operation. The thermal oxidizers shall be operated and maintained in accordance with the manufacturer's specifications to ensure a minimum volatile organic compound (VOC) destruction efficiency of 95 percent. [Special Condition 1A]
2. Von Hoffmann Press shall keep the solvents and cleaning solutions in sealed containers whenever the materials are not in use. Von Hoffmann Press shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment. [Special Condition No. 2]

**Monitoring/Record Keeping:**

1. Von Hoffmann Press shall maintain an operating, maintenance and inspection log for the regenerative thermal oxidizers which shall include the following:
2. Incidents of malfunction(s) including the dates(s) and the duration of the event, the probable cause, any corrective actions taken and the impact on emissions due to the malfunction;
3. Any maintenance activities conducted on the unit, such as replacement of equipment, etc.; and
4. A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection. [Special Condition 1B]
5. Attachment H *or an equivalent form created by the permittee* demonstrate compliance with the monitoring and recordkeeping requirements.

**Reporting:**

The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EU0090 and EU0100– Binding Operations			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0090 and EU0100	Two Units: Waste Paper from Binding Operations; MHDR = 8 tons/hour; Controlled with Cyclone and baghouse (total control efficiency 89%)	Gross/Sunday	EP-01

**PERMIT CONDITION (EU0090 & EU0100)-001**  
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitation:**

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **new** source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
  - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results (see E1 or E2), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment F)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment G)

- 4) Attachments E1 or E2, F and G contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification, as required by Section IV of this permit.

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## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### **10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions**

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

#### **10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

#### **10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

#### **10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

#### **10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:

- a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
- b) Paving or frequent cleaning of roads, driveways and parking lots;
- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

#### **10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

#### **10 CSR 10-6.045 Open Burning Requirements**

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
    1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
    2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
    3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
    4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - (B) Yard waste, with the following exceptions:
    1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
    2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;

3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
    - A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
    - B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
    - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
    - D. In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and
  4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- (3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) R.R. Donnelley & Sons Company may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if R.R. Donnelley & Sons Company fails to comply with the provisions or any condition of the open burning permit.
- (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

### **10 CSR 10-3.090 Restriction of Emission of Odors**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

**This requirement is not federally enforceable.**

### **Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

<b>10 CSR 10-6.280 Compliance Monitoring Usage</b>
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- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration**

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

**10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)**

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

**10 CSR 10-6.065(5)(C)1.A General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.



**10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios**

None.

**10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

**10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(5)(C)5 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

#### **10 CSR 10-6.020(2)(R)12 Responsible Official**

The application utilized in the preparation of this permit was signed by Chuck Bridgewater, Manager, EHS. However a letter dated June 4, 2008 was sent to amend the operating permit following the purchasing of Von Hoffman Graphics, Inc. by R.R. Donnelley & Sons Company. Following the change of ownership Richard Dunn, Vice President of Manufacturing is designated as the new responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible

person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

**10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
- c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis**

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

## VI. Attachments

Attachments follow.

## Attachment A

### VOC Log

[illegible]

If usage is in tons: Tons of Material Used X VOC Content = VOC Emissions  
 If usage is in pounds: Pounds of Material Used X VOC Content X 0.0005 = VOC Emissions  
 If usage is in gallons: Gallons of Material Used X Density X VOC Content X 0.0005 = VOC Emissions

[illegible][illegible]

The permittee is in compliance with PW001 if the annual emission of VOC is less than 100 TPY, and Permit Condition EU0010-001 if VOC emissions from EU0010 are less than 40 TPY.

# **ATTACHMENT B** **Plantwide Individual HAP Log**

HAP Name:  
CAS Number:

Material Used (Name, Type)	Amount of Material Used	Density (lb/gal)	HAP Content (mass fraction)	HAP Emissions (tons)
<b>Monthly HAP Emissions:</b>				

If usage is in tons:      Tons of Material Used X HAP Content = HAP Emissions  
 If usage is in pounds:      Pounds of Material Used X HAP Content X 0.0005 = HAP Emissions  
 If usage is in gallons:      Gallons of Material Used X Density X HAP Content X 0.0005 = HAP Emissions

Month and Year	Annual Emission for the last 12 months (tons/yr)

Month and Year	Annual Emission for the last 12 months (tons/yr)

The permittee is in compliance with PW002 if the annual emission of this HAP is less than 10 TPY.

## ATTACHMENT C

## Plantwide Combined HAP Log

[illegible]

If usage is in tons: Tons of Material Used X Total HAP Content = HAP Emissions  
 If usage is in pounds: Pounds of Material Used X Total HAP Content X 0.0005 = HAP Emissions  
 If usage is in gallons: Material Used X Density X Total HAP Content X 0.0005 = HAP Emissions

[illegible][illegible]

The permittee is in compliance with PW002 if the annual emission of combined HAP is less than 25 TPY.

[illegible]

\*\*\* Sum of last 12 month of Column 3. 32 tons or less demonstrates compliance.

## Attachment E1

Method 22 (Outdoor Observation Log)		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
<p>Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.</p> <div style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-15deg); pointer-events: none;">Draft</div>		
Observation Clock Time	Observation Period Duration (minute:second)	Accumulative Emission Time (minute:second)
Begin Observation		
End Observation		



## Attachment E2

[illegible]

An example of a log for noting when an equipment malfunction causes visible emissions.

[illegible]

## Attachment G

Method 9 Opacity Emission Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Min.	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

Was the emission unit in compliance at the time of evaluation? \_\_\_\_\_  
YES NO Signature of Observer

This sheet or something similar may be used to help show compliance with inspection, maintenance, repair and malfunction record keeping requirements in the permit.

[illegible]

# STATEMENT OF BASIS

## **Voluntary Limitations**

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

## **Permit Reference Documents**

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received March 22, 2007;
- 2) 2006 Emissions Inventory Questionnaire, received June 4, 2007; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Construction Permit No. 1294-017, Issued December 23, 1994
- 5) Construction Permit No. 0998-021, Issued September 11, 1998
- 6) Construction Permit No. 0696-019A, Issued February 19, 1997
- 7) Construction Permit No. 0795-017A, Issued September 11, 1995
- 8) Construction Permit No. 0292-009, Issued February 20, 1992
- 9) Construction Permit No. 0999-002, Issued August 18, 1999
- 10) Construction Permit No. 072005-020, Issued July 11, 2005
- 11) Construction Permit No. 0585-029A, Issued May 30, 1985

## **Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

The plant-wide permit conditions PW001 and PW002 were not included in the operating permit application but were added after consulting with the facility representative. In order to obtain an Intermediate Operating Permit the facility agreed to limit VOC and HAP emissions below the major thresholds of 100 tons/year of VOC and 10 tons/year of each individual HAP and 25 tons/year of total HAPs.

## **Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

### *10 CSR 10-6.100, Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* is not applicable because the only fuel burned at this installation is natural gas which is exempt from this rule.

10 CSR 10-6.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating* was not applied to the dryers at this facility because they are not sources of indirect heating. The definition of indirect heating source is *a source operation in which fuel is burned for the primary purpose of producing steam, hot water or hot air, or other indirect heating of liquids, gases or solids where, in the course of doing so, the products of combustion do not come into direct contact with process materials.* When the dryers combust natural gas for the purpose of creating hot air, the products of the combustion do come into contact with the process materials (the printed materials), thus making them sources of direct, rather than indirect, heating.

### **Construction Permit Revisions**

The following revisions were made to construction permits for this installation:

Construction Permit #0585-029A, Issued May 30, 1985: The special condition in this construction permit states: *If, upon initial startup of these presses, Von Hoffmann Press is found in violation of either the opacity or the odor regulations (10 CSR 10-6.220 and 10 CSR 10-3.090 respectively), the applicant will cease operation of the presses until such a time as the cause of the violations is discovered and corrected.*

Because there is no record indicating that the press violated the opacity or odor regulations upon initial startup, this special condition was not included in the operating permit.

Construction Permit #0795-017A, Issued September 11, 1995: This construction permit required the permittee to maintain records for the most recent two years of operation. This was increased to the most recent five years per current policy.

Construction Permit #0292-009, Issued February 20, 1992: This construction permit authorized the construction of Press #225 with dryer. This press has since been removed from service, therefore this emission unit is not being included in the operating permit nor are the special conditions of this construction permit.

Construction Permit No. 072005-020

Special Condition No. 3 requires Von Hoffmann Press to discontinue the operation of Press #197 before the startup of new the permitted equipment. This condition was not included in the operating permit because it has been fulfilled.

### **New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60 Subpart QQ, *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing* is not applicable because the facility does not operate any rotogravure printing presses.

### **Maximum Available Control Technology (MACT) Applicability**

40 CFR Part 63 Subpart KK *National Emission Standard for the Printing and Publishing Industry* is not applicable to the facility because it is not a major source of HAP emissions.

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

### **Other Regulatory Determinations**

#### *10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes*

This rule does not apply to EU0090 or EU0100 - Waste Paper From Binding Operations. According to 10 CSR 10-6.400(1)(B)16 any unit that at maximum hourly design rate has an uncontrolled potential to emit less than the allowable emissions as calculated according to the rule is exempt. Based on a MHDR of 8 tons/hour for each unit, the allowable emission rate is  $4.1 \times (8)^{0.67} = 16.5$  lbs/hour. The maximum potential to emit for these units, based on the calculated emission factor of 1 lb PM/ton of processed waste paper is  $8.0 \text{ ton/hr} \times 1 \text{ lb/ton} = 8 \text{ lb/hour}$ , which is less than 16.5, therefore these units are exempt from 10 CSR 10-6.400. These units remain subject to 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*.

### **Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

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Environmental Engineer

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